

June 15, 2020

**VIA ECF**

Judge Ann M. Donnelly  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Lipinski et al v. Approved Plumbing and Fire Protection LLC, et al*  
Civil Action No. 1:19-cv-04534-AMD-ST

Dear Judge Donnelly:

We write jointly with, in accordance with Your Honor's April 30, 2020 order, to provide the Court with a status update. As the Court is aware, the parties participated in a private mediation session on March 11, 2020. At the mediation, the parties reached an agreement in principle in satisfaction of all claims for the Named Plaintiffs as well as the putative class and collective. The parties are hopeful to finalize the motion for settlement approval within approximately 10 days.

As such the parties respectfully request the Court set a date in early July 2020 for submissions of Plaintiffs' anticipated Motion for Settlement Approval.

Respectfully submitted,

/s/ *Christopher Q. Davis*  
Christopher Q. Davis, Esq.

/s/ *Allan Bloom*  
Allan Bloom, Esq.